NATIONAL TRANSLATOR ASSOCIATION

OUR AIM – TO PROVIDE FM and TV SIGNALS in EVERY HOME

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RE: Administering The Grant Program For Upgrading TV Translators to Digital Output in Accordance with PL 109-171, Section 3009 as Amended

The National Translator Association (NTA) offers the following suggestions for administering PL109-171 Sec. 3009 "Low Power Television and TV Translator Upgrade Program":

1) It is recommended that the eligibility be extended retroactively to any translator that had not converted to digital operation prior to the enactment of PL 109-171, which appears to be February 08, 2006. This seems in accordance with the intent of the law and more fair than excluding those TV translator licensees who moved ahead in accordance with the overall Congressionally mandated policy of changing the national TV transmission standard to digital.

2) The use of the population in the FCC protected contour is being used for determining eligibility for the input conversion equipment. This is as good a plan as any and its use should be continued for the output conversion program.

3) It is necessary to strike a compromise between undue complexity and responsible stewardship of the federal funds in devising the application process. This is of particular concern because the grant program is directed towards the unsophisticated rural organizations that are responsible for most of the eligible TV translators, which organizations will have difficulty coping with a complex application process.

The conversion process will fall into one of two categories. First will be the translators where there is no channel change and the analog equipment is suitable for modification to digital operation. Our estimate is that the cost range for this type of conversion is in the range of

$4000 to $6000[1]. The lower end of the range will be applicable in cases where the receiving antenna and any special receiving accessories such as filters do not need to be changed . Without introducing undue complexity this category could be broken into two sub-categories The first sub-category would include TV translators that do not require changing the receiving accessories such as antennas, preamplifiers or filters. The second category would include the cases where the input accessories have to be changed either because the present accessories are at the end of their service life or because the digital input will be a different channel.

The second category will be those cases where the existing analog translator is not suitable for conversion to digital operation and/or to the final digital channel[2]. It will be necessary to purchase new translators in these instances. Considering the 20,000 population limit it is probable that most eligible analog translators are no larger than 100 watts output, and can be replaced with digital translators of no more than 30 watts output rating.. Also a significant number of TV translators are authorized to begin digital operation by installing a companion digital translator on another channel while continuing the analog operation . Such companion operation requires the purchase of a new digital translator, and in most instances an antenna. It is suggested that a maximum grant level of $20,000 is a good compromise between covering all costs and having a reasonable level of funding available for all applicants.

In the interest of fiscal responsibility it appears that a complete grant application is appropriate for a request for funding beyond the upper limit of the first category and, considering the larger size of the grant, not unduly burdensome. Our recommendation is that a grant application in the second category be structured in a manner similar to a PTFP application A funding advance of perhaps 80% of the approved amount should be allowed as an advance with the balance of the actual costs being paid after completion of the work.

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[1]Translators which receive their input signal via conventional microwave or satellite delivery will have to add pre-transmission digital signal processing equipment, (MPEG-2 encoding, PSIP, interleaving and error correction) as well as a modulator. The typical cost when this more complex equipment is required will be in the range of $10,000 provided the basic translator is suitable for conversion.

[2]Conversion of translators with tube type output stages is not recommended, and some older all transistor translators do not have the linearity required for digital operation. Translators cannot be economically changed between VHF and UHF bands or between low VHF and high VHF bands.

Regardless of the size of the grant, certification that the money received is actually used for the intended conversion should be required.

4) Priorities: Priority based on first come first served is the most equitable plan. However, if it should turn out to be necessary to establish priorities based on the characteristics of the applicant we suggest:

1) translators serving populations of no more than 10,000[3].

2) applicants with non-commercial status and an educational mission. While there is no FCC non-commercial category for TV translators the FCC has criteria for determining non-commercial educational eligibility for other types of stations. Their definition is suitable for use in establishing an educational priority.

5) Application time: It would be desirable to start the application process as soon as the applicable rules can be established. Since the FCC has not established a sunset date for analog TV translators there is no viable basis for establishing an ending date. It is recommended that the grant program remain open as long as funds for implementation are available.

- END -

September 29, 2008

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[3]Population within FCC protected contour